

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION**

REPUBLICAN NATIONAL COMMITTEE and
NORTH CAROLINA REPUBLICAN PARTY,

Plaintiffs,

v.

NORTH CAROLINA STATE BOARD OF
ELECTIONS; KAREN BRINSON BELL, in her
official capacity as Executive Director of the North
Carolina State Board of Elections; ALAN HIRSCH, in
his official capacity as Chair of the North Carolina
State Board of Elections; JEFF CARMON, in his
official capacity as Secretary of the North Carolina
State Board of Elections; STACY EGGERS IV,
KEVIN N. LEWIS, and SIOBHAN O'DUFFY
MILLEN, in their official capacities as members of the
North Carolina State Board of Elections,

Defendants,

and

DEMOCRATIC NATIONAL COMMITTEE,

Intervenor-Defendant.

Case No. 5:24-cv-547-M-RJ

**INTERVENOR-DEFENDANT DEMOCRATIC NATIONAL COMMITTEE'S CONSENT
MOTION TO AMEND THE COURT'S SCHEDULING ORDER (DE 80)**

Intervenor-Defendant Democratic National Committee (“DNC”), by and through counsel, and pursuant Federal Rule of Civil Procedure 6 and Local Civil Rule 6.1, moves this Court for an order amending the current scheduling order in this case (DE 80). In support of the Motion, the DNC respectfully shows the Court the following:

1. On February 14, 2025, the Court entered its scheduling order in this case. (DE 80). The order set out the following deadlines:
 - a. Deadline to complete discovery – October 13, 2025;
 - b. Deadline to complete mediation – October 13, 2025;
 - c. Deadline to file dispositive motions – November 12, 2025;
 - d. Final pretrial conference – February 10, 2026; and
 - e. Trial – February 24, 2026.
 2. The time for taking the above actions has not yet expired.
 3. Good cause supports an extension of above deadlines. The parties in this case are currently negotiating a settlement which would resolve the remaining claim in this case, along with other parallel cases. Allowing an extension of time will give the parties further opportunity to reach an agreed resolution in this case. The parties reasonably believe that additional time will allow them to resolve the remaining issues in this case.
 4. This request is made in good faith and not for purposes of undue delay.
 5. The DNC has conferred with counsel for the parties via email to determine whether they would consent to a 60-day extension of the above deadlines.
 6. Plaintiffs and the State Board Defendants consent to the 60-day extension.
- WHEREFORE, the DNC respectfully requests that the Court grant its motion, amend the deadlines in its scheduling order (DE 80) by 60 days, as follows:

1. Deadline to complete discovery – December 12, 2025;
2. Deadline to complete mediation – December 12, 2025;
3. Deadline to file dispositive motions – January 12, 2026;
4. Final pretrial conference – April 13, 2026; and
5. Trial – April 26, 2026.

September 4, 2025

Respectfully submitted,

/s/ Shana L. Fulton

SETH P. WAXMAN*
DANIEL S. VOLCHOK*
CHRISTOPHER E. BABBITT*
WILMER CUTLER PICKERING
HALE AND DORR LLP
2100 Pennsylvania Avenue N.W.
Washington, D.C. 20037
Phone: (202) 663-6000
Fax: (202) 663-6363
seth.waxman@wilmerhale.com
daniel.volchok@wilmerhale.com
christopher.babbitt@wilmerhale.com

JIM W. PHILLIPS, JR.
N.C. BAR NO. 12516
SHANA L. FULTON
N.C. BAR NO. 27836
WILLIAM A. ROBERTSON
N.C. BAR NO. 53589
JAMES W. WHALEN
N.C. Bar No. 58477
BROOKS, PIERCE, MCLENDON
HUMPHREY & LEONARD, LLP
150 Fayetteville Street
1700 Wells Fargo Capitol Center
Raleigh, N.C. 27601
Phone: (919) 839-0300
Fax: (919) 839-0304
jphillips@brookspierce.com
sfulton@brookspierce.com
wrobertson@brookspierce.com
jwhalen@brookspierce.com

* Local Rule 83.1(e) special appearance.